



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

FEB 13 2016

PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Honeywell International, Inc.
Attention: D. Evan van Hook
Corporate Vice President
Health, Safety, Environment, Product Stewardship, and Sustainability
115 Tabor Road
Morris Plains, NJ 07950

Re: Request for Information Pursuant to the Comprehensive
Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601, et seq.

Dear Mr. van Hook:

The U.S. Environmental Protection Agency ("EPA") is charged with responding to the release or threat of release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA" or the "Superfund law"), 42 U.S.C. §§ 9601-9675. www.epa.gov/superfund/action/law/index.htm.

Under Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), EPA has broad information gathering authority which allows EPA to require persons to provide information and/or documents relating to materials generated, treated, stored, or disposed of at or transported to a facility, the nature and extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a facility and information relating to the ability of a person to perform a cleanup.

This letter seeks your cooperation in providing information and documents relating to all past and present operations of your company (and its predecessors in interest) located in or within a fifteen mile radius of Hoosick Falls, New York, and the release or threat of release of hazardous substances or pollutants or contaminants at or from those facilities or operations. A complete and truthful response should be provided to the attached Request for Information by **April 1, 2016**.

While EPA seeks your company's cooperation in this investigation, compliance with the Request for Information is required by law. When the company has prepared its response to the Request for Information, please have the enclosed "Certification of Answers to Request for Information" signed and notarized and return that Certification to EPA with the response. Please note that false, fictitious, or fraudulent statements or representations may subject the company to civil or

criminal penalties under federal law. In addition, Section 104(e) authorizes EPA to pursue penalties for failure to comply with Requests for Information.

If you have information about other parties who may have information regarding the enclosed Request, that information should be submitted within the time frame noted above.

Please note that if after submitting your response you obtain additional or different information concerning the matters addressed by our Request for Information, it is necessary that you promptly notify EPA.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

Some of the information EPA is requesting may be considered by the company to be confidential. Please be aware that the company may not withhold the information on that basis. If the company wishes EPA to treat such information confidentially, it must advise EPA of that fact by following the procedures outlined in the enclosed instructions, including the requirement for supporting its claim for confidentiality.

See the enclosed Instructions for information on how to respond to the enclosed questions and/or information requests. Your response to this Request for Information should be mailed to:

Nicoletta M. DiForte
Emergency and Remedial Response Division
U.S. Environmental Protection Agency - Region II
290 Broadway, 19th Floor
New York, NY 10007-1866

with a copy to:

Amy Chester
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency - Region II
290 Broadway, 16th Floor
New York, NY 10007-1866

If you have any questions regarding this Request for Information, please have your attorney contact Amy Chester of EPA at (212) 637-3213.

We appreciate and look forward to your prompt response to this information request.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Nicoletta DiForte".

Nicoletta M. DiForte
Deputy Director for Enforcement
Emergency and Remedial Response Division

Enclosure

cc: Edward McTiernan, Esq.

Instructions for Responding to Request for Information

A. Directions

1. A complete and separate response should be given for each question. For each question contained in this letter, if information or documents responsive to this information request are not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Identify each answer with the number of the question and the subpart to which it responds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the question to which it applies.
3. Provide responses to the best of your company's ability, even if the information sought was never put down in writing or if the written documents are no longer available. Consult with all present and past employees and agents of your company whom you have reason to believe may be familiar with the matter to which the question pertains.
4. In answering each question, identify each individual and any other source of information (including documents) that were consulted in the preparation of the response to the question.
5. If additional information or documents responsive to this Request becomes known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that your company supplement its response to EPA within 30 days from the date such information or documents became available to it.
6. If you have reason to believe that an individual other than one employed by your company may be able to provide additional details or documentation in response to any question, state that person's name, last known address, phone number, and the reasons for your belief.
7. If a document is requested but not available, state the reason for its unavailability. To the best of your ability, identify the document by author, date, subject matter, number of pages, and all recipients of the documents with their addresses.
8. If anything is omitted from a document produced in response to the Request for Information, state the reason for, and the subject matter of, the omission.
9. If you cannot provide a precise answer to a question, please approximate but, in any such instance, state the reason for your inability to be specific.

10. Whenever this Request for Information requests the identification of a natural person, or other entity, the person or entity's full name and present or last known address also should be provided.
11. Provide documents that support or help explain each of your answers to the Request for Information and indicate, in your answers, precisely which part of which document is pertinent to your answer.
12. If the information requested has previously been submitted to EPA, the response may detail exactly when and where that information was previously submitted to EPA (*i.e.*, the date of the submission, the recipient of the information, and the location of responsive information) in lieu of resubmitting the information.
12. Confidential Information: The information requested herein must be provided even though your company may contend that it includes confidential information or trade secrets. Your company may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. § 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b).

If you make a claim of confidentiality for any of the information your company submits to EPA, your company must prove that claim. For each document or response your company claims is confidential, your company must separately address the following points:

1. the portions of the information alleged to be entitled to confidential treatment;
2. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
3. measures taken by your company to guard against the undesired disclosure of the information to others;
4. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
5. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
6. whether your company asserts that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise

non-confidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that your company satisfactorily show that it has taken reasonable measures to protect the confidentiality of the information and that it intends to continue to do so, and that it is not and has not been obtainable by legitimate means without your company's consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by Section 104(e) of CERCLA. If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to your company.

B. Definitions

1. The term "person" shall include any individual, firm, unincorporated association, partnership, corporation, trust, or other entity.
2. The terms "the Company" or "your Company" shall mean Honeywell International, Inc. and its predecessors, successors, subsidiaries, divisions, branches, officers, managers, employees, contractors, trustees, partners, assigns, or agents, including but not limited to the following corporate entities: (i) Fluorglas; (ii) Allied Corp.; (iii) AlliedSignal Inc.; (iv) AlliedSignal Laminate Systems Inc.; (v) Furon Co.; (vi) Oak Electronics Corp.; (vii) Oak Industries; (viii) Oak Industries Materials Group, Inc.; (ix) Norplex/Oak Inc.; (x) Norplex Oak Inc.; (xi) Dodge Fibers Corp.; (xii) Dodge Industries, Inc.; (xiii) Dodge Fluorglas; (xiv) Tri-Point Industries Co.; (xv) Atlantic Laminates Co.; (xvi) Circuit Materials Co.; (xvii) Oak Mitsui, Inc.; and (xviii) Oak Mitsui Technologies.
3. The term "hazardous substances" shall have the same definition as that contained in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and includes any mixtures of such hazardous substances, products or other nonhazardous substances.
4. The term "pollutant or contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA, 42 U.S.C. § 9601(33), and includes any mixtures of such pollutants or contaminants with any other substances. Petroleum products mixed with pollutants and contaminants are also included in this definition.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known employer and business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, occupation, position or business.
6. With respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) the term "identify" means to provide its full name,

address, and affiliation with the individual and/or company to whom this request is addressed.

7. The term “document” and “documents” includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.
8. The term “arrangement” means every separate contract or other agreement between two or more persons, whether written or oral.
9. The term “material” or “materials” shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.
10. The term “real estate” shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.
11. The term “release” shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, and other closed receptacles containing any hazardous substance or, pollutant, or contaminant.
12. The term “PFC” refers to a perfluorinated chemical or fluoropolymer and includes, but is not limited to, fluorinated emulsifiers such as perfluorooctanoic acid (PFOA) and salts thereof, such as ammonium perfluorooctanoate (APFO).
13. The term “PFC-producing material” refers to any material that releases, generates or has a PFC as a by-product or waste when subject to thermal, physical, or chemical processes.
14. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or the Resource Conservation and Recovery Act, as amended (“RCRA”), 42 U.S.C. § 6901, et. seq., in which case the statutory definitions shall apply.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of _____

County of _____

I certify under penalty of law that I have personally examined and am familiar with the document submitted in response to EPA's Request for Information, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted document is complete and authentic unless otherwise indicated. I am aware that there are significant potential penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional or different information relevant to the matters addressed in EPA's Request for Information or the Company response thereto should become known or available to the Company.

NAME (print or type)

TITLE (print or type)

SIGNATURE

Sworn to before me this day
of _____, 2016

Notary Public

Request for Information

1. Please provide the following information for: i) the facility located at or about 14 McCaffrey Street in Hoosick Falls, New York; ii) the facility located at or about 1 Liberty Street in Hoosick Falls, New York; iii) the facility located or formerly located at or about 1 Mechanic Street in Hoosick Falls, New York; iv) the facility located or formerly located at or about 80 First Street in Hoosick Falls, New York; v) the facility located or formerly located at or about 3 Lyman Street in Hoosick Falls, New York; vi) the facility located or formally located at or about 21410-12 Rte 22 in Hoosick Falls, New York; and vii) any other facility that is or has been owned or operated by the Company in or within a fifteen mile radius of Hoosick Falls, New York.
 - a. Identify each facility in which a PFC, PFC-containing or PFC-producing material is or was stored, used, processed, manufactured, managed, released, generated as a by-product, derivative or thermal breakdown product, or otherwise present (hereinafter collectively referred to as "handled"). Identify each specific PFC (for example, PFOA), PFC-containing or PFC-producing material that is or was handled at each such facility, and state the time period during which each PFC, PFC-containing or PFC-producing material was or has been handled at each such facility.
 - b. For each facility identified in response to Question 1.a., provide details indicating how each PFC, PFC-containing or PFC-producing material is or was handled, the quantity of each specific PFC, PFC-containing or PFC-producing material handled on an annual basis, and the date such operations commenced and concluded.
 - c. For each facility identified in response to Question 1.a., state the correct legal name(s) of each current and past owner and operator of the facility and the street and present mailing address of each such owner and operator. For each such entity, explain its direct or indirect relationship to your Company (if any), the time period when the entity owned or operated the facility, and the nature of the operations conducted by the entity at the facility.
 - d. For each facility identified in response to Question 1.a., describe in detail the manufacturing process(es) which utilized a PFC, PFC-containing or PFC-producing material either as a component employed in the formulation of an object made for sale, for use offsite or onsite, as a reagent in the manufacturing process, or as an item utilized in maintenance activities. Indicate the specific PFC, PFC-containing and/or PFC-producing material involved, and the time frames such manufacturing processes commenced and concluded at each facility.

- e. For facility identified in response to Question 1.a., identify any type of process equipment and/or machinery employed, the location of the process equipment and/or machinery, how the process equipment and/or machinery and related apparatus are and were cleaned, and how residue or rinsate from the process equipment and/or machinery is and was managed, treated and/or disposed of. If rinsate or residue was collected in drums, tanks, dip tanks, vats, baths, settling pits or other units, please provide details regarding these units, including their location, periods of use, whether there were releases from these units, and how such releases were managed and/or remediated. Provide detailed maps or diagrams on which each of the locations referred to in your answer to this question is clearly marked.
- f. Of the facilities identified in response to Question 1.a., indicate which facilities operated and maintained heating or fabric coating towers for the application of PFOA/APFO, epoxy resins or any other type of dispersion agents or materials. Identify all of the specific materials (including polymers, dispersion agents and surfactants) used in these operations including: their annual volumes; how the PFOA/APFO is and was applied; how the towers and dip tanks are and were maintained and cleaned; the operational temperatures and exit velocities from the oven exhaust; the specific materials discharged from the oven exhausts; the height of the towers, including the stack, if any, projecting outside of the building; and how these processes changed through the years of operation at each specific facility. Provide detailed maps or diagrams on which the towers referred to in your answer to this question are clearly marked.
- g. Provide copies of all available process diagrams and/or design schematics specifically for each of the facilities identified in response to Question 1.a. and the processes identified in response to Questions 1.d., e. and f.
- h. For each facility identified in response to Question 1.a., indicate whether any hazardous substances, pollutants or contaminants, including PFC, PFC-containing or PFC-producing materials, are or have been discharged directly into a sewer, septic system, or any type of subsurface structures, including injection wells. If so, indicate which specific production wastes, process chemicals or raw materials, including PFC, PFC-containing and/or PFC-producing materials, were involved and the time period during which this occurred, and provide a diagram indicating the location of the sewer(s), septic system(s) or any type of subsurface structures, including injection wells. Also provide the results of any sewer integrity investigations.
- i. For each facility identified in response to Question 1.a., indicate whether any hazardous substances, pollutants or contaminants, including PFC, PFC-containing or PFC-producing materials, are or have been discharged into surface waters

through outfalls that were permitted by a state or federal National Pollution Discharge Elimination System (NPDES) permit (or that were not permitted). Explain the process leading to these discharges, the location of each point of discharge (permitted or not), the specific production wastes, including PFC, PFC-containing and/or PFC-producing materials, that were involved, and the time frames during which these discharges occurred. Provide copies of all such permits. Also, provide detailed maps or diagrams on which each of the discharge points is clearly marked.

- j. For each facility identified in response to Question 1.a., indicate whether any hazardous substances, pollutants or contaminants, including PFC, PFC-containing or PFC-producing materials, is or was stored in an underground or above-ground storage tank. If yes, provide the following answers and all documents relevant to your responses:
 - i. Supply the date when the tanks were installed, each tank's size and material of construction, where they were installed, for what purpose, and which specific production wastes, process chemicals or raw materials, including PFC, PFC-containing or PFC-producing materials, are or were stored in them.
 - ii. Were any of these tanks ever removed or did they ever leak? If so, provide details on any investigation or remediation associated with these tanks, including the time frames when these occurred.
 - iii. Provide maps or diagrams on which the tank locations are clearly marked.
- k. For each facility identified in response to Question 1.a., describe all leaks, spills, disposal or other releases of any hazardous substance, pollutant or contaminant, including but not limited to a PFC, PFC-containing or PFC-producing materials, that occurred at or from the facility. The response should include but not be limited to the following information as to each such occurrence:
 - i. The date of the occurrence;
 - ii. The specific location of the occurrence (indicate on a map);
 - iii. The quantity of material leaked, spilled or released;
 - iv. Steps taken to remediate or stop the release;
 - v. The specific hazardous substance, pollutant or contaminant that was involved, including the nature and composition of the material, and the physical state (solid, liquid, etc.) of such material; and
 - vi. A copy of all documentation relating to the release.
- l. For each facility identified in response to Question 1.a., indicate whether a PFC, PFC-containing or PFC-producing material is being, has been or may have been released from air emitting sources, including stacks, fans, vents or any other point of emission. If so, identify each source and the specific PFC, PFC-containing and/or PFC-producing material involved, and provide any related air permits.

Explain the process leading to the emission of the PFC, PFC-containing or PFC-producing material, and the time frames during which these air emissions may have occurred. Provide any air monitoring reports and analytical data related to these air emissions. Also, provide detailed maps or diagrams on which each of the air emitting sources referred to in your answer to this question is clearly marked.

- m. Provide copies of air models developed with respect to any of the facilities identified in response to Question 1.a., including dispersion, photochemical or receptor models.
 - n. Please provide a list identifying all off-site treatment, storage or disposal sites used by each facility identified in response to Question 1.a. for any PFC, PFC-containing or PFC-producing material. The list should include all locations used both within and outside of Hoosick Falls, regardless of whether the site or property was permitted or not permitted. The list should include the following information:
 - i. the name and address of each such disposal or treatment site;
 - ii. the time period the material was disposed and/or treated;
 - iii. how the material was treated and/or disposed;
 - iv. the specific PFC, PFC-containing or PFC-producing material involved;
 - v. the quantity, nature and composition of the material, and its physical state (solid, or liquid, etc.); and
 - vi. any shipping documents, manifests or bills of lading prepared with respect to the off-site shipment of the materials.
 - o. Provide a map which shows all monitoring wells installed at or near each of the facilities identified in response to Question 1.a. In addition, please provide the identification system used to identify each well, the total depth and size of each well, and the depth and the length of each well screen. In addition, provide all boring logs for each monitoring well location.
 - p. For each facility identified in response to Question 1.a., identify any water supply/production wells that were operated and maintained onsite at any of the facilities. Provide the date for when the wells were installed, the depth and size of each well, the length of each well screen, construction and well logs, pumping rates, daily/annual usage and the results of any pump tests that may have been performed. Include a map identifying the location of the well(s).
 - q. Please submit all reports and analytical data from the sampling of soils, sediments, groundwater, surface water, or marine life at or near any of the facilities identified in response to Question 1.a., along with maps showing the respective sampling locations.
2. What is the direct or indirect corporate or legal relationship between each of the entities listed in the definition of “the Company” in **Section B., Definitions**, of the Instructions for Responding to Request for Information set forth above? In addition, provide a chronology showing the acquisitions and/or mergers involving these companies.

3. Please provide a copy of all agreements in or pursuant to which the Company provided or received indemnification with respect to environmental liability relating to any of the facilities identified in response to question 1.a.
4. Please state the name, title and address of each individual who assisted or was consulted in the preparation of your response to this Request for Information. In addition, state whether this person has personal knowledge of the information in the answers provided.